UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFRONIA 94105

ENFORCEMENT AND COMPLIANCE
ASSURANCE DIVISION

DATE: January 18, 2023

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Republic Services – Sunshine Canyon Landfill, Sylmar, California

FROM: Scott Connolly, Environmental Engineer
Air Section, Air, Waste & Analysis Branch,
Enforcement and Compliance Assurance Division

THRU: Roshni Brahmbhatt, Manager
Air Section, Air, Waste & Analysis Branch,
Enforcement and Compliance Assurance Division

TO: File

BASIC INFORMATION

Facility Name: Republic Services – Sunshine Canyon Landfill

Facility Location: 14747 San Fernando Road, Sylmar, California

Date of Inspection: November 9, 2022

EPA Inspectors:
1. Scott Connolly, Environmental Engineer
2. Janice Chan, Physical Scientist

Other Attendees
1. Kate Downey, Environmental Manager, Republic Services
2. William Carr, Division Manager, Republic Services

Contact Email Address: Kate Downey kdowney@republicservices.com

Purpose of Inspection: To determine compliance with the Clean Air Act

Facility Type: Municipal Solid Waste Landfill

Regulations Central to Inspection: 40 C.F.R. Part 60 Standards of Performance for Municipal Solid Waste Landfills and 40 C.F.R. Part 63, Subpart AAAA National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills

Arrival Time: 9:15 AM
Departure Time: 1:50 PM

Inspection Type:
☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Credentials Presented
☒ CBI warning to facility provided

The following information was obtained verbally from Kate Downey or William Carr unless otherwise noted.

Facility and Process Description:
The Republic Services Sunshine Canyon Landfill ("the Landfill") is a municipal solid waste landfill that began accepting waste in the 1950s, as two separate landfills owned by the City of Los Angeles ("city landfill") and as the County of Los Angeles ("county landfill"). The landfills were merged in to one privately owned landfill in 2008, named Browning Ferris Incorporated (BFI), dba Sunshine Canyon Landfill. Currently, the landfill is permitted to place 12,000 tons per day of waste and cover and operates Monday through Saturday. The Landfill only accepts waste from the City and County of Los Angeles. The Landfill operates a gas collection and control system that consists of 1055 wells, 214 horizontal collectors and 5 enclosed flares. 10,000 scfm of collected landfill gas containing about 42-45% methane is sent to one of five engines and turbines in a gas to energy plan owned and operated by a third party, called Sunshine Gas Producers. The remaining 7000 to 10,000 scfm of landfill gas is combusted in the flares. The Landfill operates Zule flares #9, #10 and #11 next to the gas to energy plan to control collected gas from the "county" side of the landfill. Typically, two of the 5000 scfm flares operate at a time with one flare as a backup. Flare 1 and 3 controls all of the older "city" side of the landfill. The Landfill operates the flare locations as 2 separate gas collection system that have some overlap in collection areas.

Staff Interview:
The landfill does not accept any hazardous waste and only accepts select asphalt and concrete wastes to be used for landfill road construction. The landfill operates two different working faces, one for normal operating conductions and one for wet weather conditions. Thin plastic covers are used as daily cover on the working face and are designed to degrade in the landfill over time so that they don't need to be removed and can be filled over each day. The landfill is constructed in a valley to a design specification of either a 5 to 1 intermediate slope or a 3 to 1

final slope. Select areas of the landfill are covered in artificial turf to reduce odors and turf sections will be removed to provide additional fill area when the capacity is needed.

The landfill installed the Zule flares in 2008, but the rest of the landfill flares have been onsite controlling landfill gases before that year. The landfill conducts emissions testing on the Zule flares every 3 years, with Flare 10 being tested in 2021, Flare 9 tested in 2022 and Flare 11 scheduled to be tested in 2023. Currently, the landfill is not running Flare 9 because it was not able to pass the most recent emissions testing for nitrogen oxides and requires a retrofit before it can operate in compliance.

The landfill has a contractor conduct monthly surface monitoring and the contractor generates quarterly reports to send to the air district. The landfill repairs, replaces and decommissions wells once per year during a construction period and is only able to decommission wells and build new wells during this period.
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TOUR INFORMATION

EPA toured the facility: Yes

Field Measurements and Observations:
At the time of the inspection the landfill was actively depositing waste on the "wet weather" working face because of the heavy rainfall event the previous 24 hours.

Scott Connolly conducted surface emissions monitoring at various wells using a TVA 2020, ID: #S72354, and EPA Method 21, calibrated using methane concentrations of 500 and 10,000 ppm, and EPA Method 21. methane. Janice Chan used a FLIR camera to perform optical gas imaging observations at all monitored wells and did not observe or record any apparent leaks. EPA monitored approximately 41 active wells and gas collection system components. Using surface emissions monitoring was conducted in three open areas of the landfill, including the "upper area of the county landfill" near the flares and gas to energy plant, In the "lower" turf covered area near the landfill offices and the "upper area of the city landfill" near flare #1.

At Well 6020 using EPA Method 21, landfill gas concentration at a maximum of 1500 ppm were measured at Well 6020, which was confirmed by the Landfill's surface emissions monitoring contractor with a reading of 1200 ppm.

Zule Flare #11 was operating at about 2640 scfm and approximately 1653 ºF. Zule Flare #10 was operating at about 2641 scfm and approximately 1649 ºF. Method 21 was conducted on positive pressure pipes connected to both flares no measurements above background concentrations were detected. The Landfill was sending an additional 7892 scfm to the third-party on-site gas to energy plant.

Photos and/or Videos: were taken during the inspection.

Scott Connolly took photos using a digital camera. A log of images and videos are available in Appendix A.

CLOSING CONFERENCE

The Closing Conference began at 13:25. At the request of landfill staff the Closing Conference was conducted with several virtual attendees including:

- Niki Wuestenberg, Air Compliance National Assistance, Republic Services
- Benjamin Wade, Area Environmental Manager, Republic Services
- Andrew Thompson, Area Environmental Manger, Republic Services

Requested documents:

- Monthly Tonnage of Waste Accepted in the Last 2 years
- Most Recent Map of the Landfill, that includes well locations
- Last 4 Quarters of Surface Monitoring Reports
- Design Report for the Landfill
- Last Source Tests for Flare #'s 1, 3, 10, & 11
- Last 2 Source Tests for Flare #9

Concerns: EPA notified Republic Services landfill staff of the leaking well that was observed during the inspection.

SIGNATURES

Report Author: SCOTT CONNOLLY Digitally signed by SCOTT CONNOLLY Date: 2023.01.18 07:47:54 -08'00'

Section Manager: Chew, Andrew Digitally signed by Chew, Andrew Date: 2023.01.18 13:45:13 -08'00'

APPENDICES AND ATTACHMENTS

A. Digital Media Log

Facility Name: Republic Services – Sunshine Canyon Landfill
Facility Location: 14747 San Fernando Road, Sylmar, California
Date of Inspection: November 9, 2022

APPENDIX A: DIGITAL MEDIA LOG

1. Photographer Name: Scott Connolly	**2. Date of Inspection:** November 9, 2022
3. Company/Facility Name: Republic Services – Sunshine Canyon Landfill	**4. Street Address, City, State:** 14747 San Fernando Road, Sylmar**,** California
5. Number of Images: 41 photos	**6. Archival Record Location:** EPA SharePoint

Image Number	File Name	Date and Time (incl. time zone and DST)	Description of Image
1	PB090033.JPG	11/9/2022 09:43	Satellite overview image of the landfill
2	PB090034.JPG	11/9/2022 11:17	Overview of the landfill from the Flare Station
3	PB090035.JPG	11/9/2022 11:17	Overview of the landfill from the Flare Station
4	PB090036.JPG	11/9/2022 11:20	Inlet header to the flares and the flare stacks
5	PB090037.JPG	11/9/2022 11:24	Flare #9 and #10 Control Panel readout screen
6	PB090038.JPG	11/9/2022 11:28	Flares #9 (left) #10 (Center) and #11 (right)
7	PB090039.JPG	11/9/2022 11:40	Well 574
8	PB090040.JPG	11/9/2022 11:45	Well CGW 6015
9	PB090041.JPG	11/9/2022 11:49	Well CGW 3874
10	PB090042.JPG	11/9/2022 11:51	Well CGW 645
11	PB090043.JPG	11/9/2022 11:56	Well CGW 2020
12	PB090044.JPG	11/9/2022 11:59	Well CGW 6020
13	PB090045.JPG	11/9/2022 12:09	Well CGW 537
14	PB090046.JPG	11/9/2022 12:09	Well CGW 537
15	PB090047.JPG	11/9/2022 12:14	Well CGW 6018, Well CGW 3042S and Well CGW 3042D
16	PB090048.JPG	11/9/2022 12:15	Well CGW 2032D and Well CGW 2032S
17	PB090049.JPG	11/9/2022 12:18	Well CGW 3737R
18	PB090050.JPG	11/9/2022 12:19	Well CGW 3737, C-97, D-164
19	PB090051.JPG	11/9/2022 12:22	Well CGW 2023D
20	PB090052.JPG	11/9/2022 12:23	Well CGW 6018
21	PB090053.JPG	11/9/2022 12:27	Well CGW 541
22	PB090054.JPG	11/9/2022 12:31	Well CGW 227D
23	PB090055.JPG	11/9/2022 12:50	Well GW7019
24	PB090056.JPG	11/9/2022 12:52	Flare #1

25	PB090057.JPG	11/9/2022 12:59	Well GW22
26	PB090058.JPG	11/9/2022 13:05	Well GW7004
27	PB090059.JPG	11/9/2022 13:08	Well GW791
28	PB090060.JPG	11/9/2022 13:10	Well GW783
29	PB090061.JPG	11/9/2022 13:15	Well GW787
30	PB090062.JPG	11/9/2022 13:18	Well GW792
31	PB090063.JPG	11/9/2022 13:20	Well GW705
32	PB090064.JPG	11/9/2022 13:47	Gas Line Sump Pump CS34
33	PB090065.JPG	11/9/2022 13:54	Well GW1029
34	PB090066.JPG	11/9/2022 13:57	Well ATC0021 and ATC0024
35	PB090067.JPG	11/9/2022 13:59	Well ATC00043
36	PB090068.JPG	11/9/2022 14:01	Well GW002057
37	PB090069.JPG	11/9/2022 14:02	CTV#68 Pressure relief valve
38	PB090070.JPG	11/9/2022 14:05	Well GW1028 and ATW24
39	PB090071.JPG	11/9/2022 14:08	CTV#18 Pressure relief valve
40	PB090072.JPG	11/9/2022 14:10	Well GW1025
41	PB090073.JPG	11/9/2022 14:10	Well ATW18